

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Miami Division

JANE DOE,

Case No: 1:25-cv-20757-JB/Torres

Plaintiff,

vs.

STEVEN K. BONNELL II,

Defendant.

**STIPULATION BETWEEN PLAINTIFF AND NONPARTY LOLCOW, LLC
REGARDING LIMITED SUBMISSION TO JURISDICTION FOR PURPOSES OF
COMPLYING WITH PROPOSED COURT ORDER**

TO THE HONORABLE COURT:

Plaintiff, Jane Doe, is a party to the above-captioned matter pending before this Court. Nonparty Lolcow, LLC (“Nonparty”) is the company which owns and manages the Kiwi Farms, an Internet forum available at <<https://kiwifarms.st>>, and is not a party to the litigation. Plaintiff has submitted a proposed court order titled “[Proposed] Order Granting Plaintiff’s Motion to Compel Lolcow, LLC to Remove Videos of Jane Doe “(the “Proposed Order”) [ECF No. 80-1] that requires certain compliance by Nonparty.

WHEREAS Plaintiff has requested that Nonparty acknowledge and agree to the Court’s jurisdiction for the limited purpose of complying with the Proposed Order, and Nonparty has agreed to voluntarily submit to this limited jurisdiction under the terms stated herein;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Nonparty (together, the "Parties"), subject to this Court's approval, as follows:

I. LIMITED SUBMISSION TO JURISDICTION

Nonparty Lolcow, LLC expressly acknowledges and agrees to submit to the jurisdiction of this Court solely and exclusively for the purpose of complying with the Proposed Order attached hereto as Exhibit A.

Nonparty's submission to the jurisdiction of this Court is strictly limited in scope to the enforcement, compliance, and resolution of any disputes arising under the Proposed Order.

This Stipulation does not constitute a waiver by Nonparty of any arguments relating to personal jurisdiction, venue objections, or other legal defenses in any unrelated matter or proceeding, nor does it create, establish, or imply any ongoing or general obligation to appear before this Court beyond the limited purposes described above. Nor will this stipulation be construed in any way which would imply that Lolcow, LLC is or should be joined to this action pursuant to Fed. R. Civ. P. 19.

II. SCOPE OF SUBMISSION

Nonparty acknowledges receipt of the Proposed Order (Exhibit A) and agrees to comply fully with its enforceable terms, including but not limited to:

- (a) Removing the content hosted at the enumerated URLs from the Kiwi Farms website.

The Parties respectfully request that this Court approve and enter this Stipulation. The Parties further request that this Court retain jurisdiction over the enforcement of this Stipulation and the Proposed Order for the duration of its application, subject to further order from this Court. This Stipulation is entered pursuant to and governed by Federal Rule of Civil Procedure 45 and any other applicable procedural rules governing nonparty compliance with court orders.

Nonparty confirms that it has reviewed the terms of the Proposed Order and this Stipulation and acknowledges a reasonable understanding of its obligations; Nonparty acknowledges that it is entering into this Stipulation voluntarily and without coercion.



Joshua Moon Member
Lolcow, LLC
Signed June 6th, 2025

Dated: June 6, 2025.

JSP LAW, LLC
Joan Schlump Peters
(admitted *pro hac vice*)
4819 W. Blvd. Ct.
Naples, FL 34103
Tel. 305-299-4759
Email: petersjoan@bellsouth.net
Counsel for Plaintiff JANE DOE

**SANCHEZ-MEDINA GONZALEZ QUESADA
LAGE GOMEZ & MACHADO, LLP**
CARLOS A. GARCIA PEREZ
Florida Bar No. 106895
GUSTAVO D. LAGE
Florida Bar No. 972551
201 Alhambra Circle, Suite 1205
Coral Gables, Florida, 33134
Tel.: (305) 377-1000
Primary E-Mail: cgarciaperez@smgqlaw.com
Primary E-Mail: glage@smgqlaw.com
Counsels for Plaintiff



By: _____

CARLOS A. GARCIA PEREZ
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 6, 2025 a true and correct copy of the foregoing was served on all parties via the CM/ECF filing portal to all counsel of record.



By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff